

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D., and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10294 DPW

MICHELLE TREBITSCH, On Behalf Of  
Herself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10307 DPW

INFORMATION DYNAMICS, LLC, On  
Behalf of Itself and All Others Similarly  
Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R.  
JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M.  
AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10308 DPW

[Additional Captions Follow on Next Page]

**JAMES M. BROWER'S MOTION FOR  
CONSOLIDATION, APPOINTMENT AS LEAD  
PLAINTIFF, AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

PETER KALTMAN, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RUBEN  
GRUBER, HASSAN AHMED and  
STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10309 DPW

SAMANTHA DEN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10310 DPW

RICHARD CURTIS, Individually And on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10314 MLW

**[Additional Captions Follow on Next Page]**

RONALD KASSOVER, on Behalf of the  
Ronald Kassover IRA and All Others  
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10329 DPW

STEVE L. BAKER, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10333 DPW

MICHAEL KAFFEE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10345 DPW

**[Additional Captions Follow on Next Page]**

HAIMING HU, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D., and STEPHEN NILL,

Defendants.

Civil Action No. 04-10346 DPW

CHARLES STARBUCK, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D., and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10362 DPW

SAMUEL HO, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10363 DPW

**[Additional Captions Follow on Next Page]**

JEFFREY C. RODRIGUES, Individually  
and On Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10364 DPW

ROBERT CONTE and MARK RESPLER,  
Themselves and On Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10382 DPW

WHEATON ELECTRICAL SERVICES  
RETIREMENT 401K PROFIT SHARING  
PLAN, On Behalf of Itself and All Others  
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10383 DPW

**[Additional Captions Follow on Next Page]**

BRIAN CLARK, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R.  
JONES, EDWARD N. HARRIS, J.  
MICHAEL O'RIARA, HASSAN M.  
AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10454 DPW

SHEILA BROWNELL, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV- 10597 DPW

SAVERIO PUGLIESE, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10612 DPW

[Additional Captions Follow on Next Page]

DAVID V. NOCITO, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10623 DPW

James M. Brower, by his counsel, hereby respectfully moves this Court to:

(i) consolidate all related actions; (ii) be appointed Lead Plaintiff in the consolidated securities class action; and (iii) approve his selection and retention of Berman DeValerio Pease Tabacco Burt & Pucillo as Lead Counsel.

In support of this Motion, Plaintiff submits herewith a Memorandum of Law, the Declaration of Michael T. Matraia, and a Proposed Order.

Dated: April 12, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE  
TABACCO BURT & PUCILLO**



Jeffrey C. Block, BBO # 600747

Michael T. Matraia, BBO # 633049

Nicole R. Starr, BBO #654848

One Liberty Square

Boston, Massachusetts 02109

(617) 542-8300

**Attorneys for Plaintiff James M. Brower  
and Proposed Lead Counsel**

Eduard Korsinsky  
Zimmerman Levi & Korsinsky, LLP  
39 Broadway, Suite 1440  
New York, NY 10006  
(212) 363-7500

Sonus/dp/LP\_Motion